EDUCAUSE

April 16, 2012

VIA ECFS

Ms. Marlene H. Dortch Secretary Office of the Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, DC 20554

Notice of Ex Parte Meeting

Re: Ex Parte Contact in Universal Service Contribution Methodology, WC Docket No. 06-122

Dear Ms. Dortch:

On behalf of EDUCAUSE, the undersigned and John Windhausen of Telepoly Consulting, met with the following members of the Telecommunications Access Policy Division on April 13, 2012: Trent Harkrader, Vickie Robinson, Ernesto Beckford, Claudia Fox, Carol Pomponio, Erica Myers, and Chin Yoo.

During the meeting, EDUCAUSE acknowledged that the current mechanism of collecting Universal Service Fund (USF) fees on interstate and international end user telephone calls does not reflect the modern communications marketplace. EDUCAUSE seeks a predictable, simple, equitable and long-lasting alternative mechanism that maintains the USF well into the future. In particular, we focused on the importance of maintaining the distinction between private networks and public networks. Private networks (such as the inside wire in homes and buildings, intra-corporate networks, and internal campus networks) are separate from the public network and should not be required to support the costs of those public networks.

Accordingly, EDUCAUSE recommends that the new USF contribution methodology be easy to understand, administered simply, accommodate technological progress, resist manipulation, gamesmanship, and subterfuge, rely on metrics readily and transparently accessible to direct contributors and to end users, and not introduce major new burdens disproportionate to the burden different users impose on the public network.

Pursuant to the Commission's rules, this notice is being filed in the above referenced docket. Please let me know if you have any questions.

Sincerely,

Gregory V. Haledjiá

Policy Specialist

cc:

Trent Harkrader Vickie Robinson Ernesto Beckford Claudia Fox Carol Pomponio Erica Myers Chin Yoo

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